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February 11, 2016

VIA ECF

Hon. Peggy Kuo
United States Magistrate Judge
United States District Court, E.D.N.Y.
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Liberty Mutual Fire Ins. Co., et al. v. Isaac Shapson, et al.
13-CV-5046 (ENV) (PK)

Dear Magistrate Judge Kuo:

We represent Plaintiffs in the above-referenced matter and are writing to respectfully request a conference to discuss lifting the stay of party discovery and setting a discovery schedule. By way of brief background, on April 24, 2014, Defendants Issac Shapson, Nortmed Management, Inc., Pervaiz Qureshi, M.D., SD Medical, P.C., and P.R. Medical, P.C. moved to dismiss the Action. *See* ECF No. 50 (Mot. to Dismiss). On May 21, 2014, Magistrate Judge Viktor V. Pohorelsky held a Status Conference, at which he ordered that discovery be stayed between the parties pending a decision on the Motion to Dismiss. *See* ECF No. 55 (Minute Entry). As the decision on the Motion to Dismiss is still pending, Plaintiffs respectfully request that the Court schedule a conference, on any date convenient for the Court, to discuss lifting the stay to allow the parties to proceed with discovery and setting a corresponding discovery schedule.

Thank you for your consideration in this regard.

Respectfully submitted,

Stern & Montana, LLP

By: /s/ James A. McKenney
James A. McKenney (JM-6164)

cc: All Counsel (via ECF)